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Via ECF

Honorable Leda Dunn Wettre
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: *Priti Gupta, et al. v. Urban Food Bazaar LLC, et al.*
Case No. 19-cv-993 (MCA) (LDW)
Joint Letter Motion for Approval of Parties' FLSA Settlement Agreement

Dear Judge Wettre:

We are counsel to Plaintiffs Priti Gupta ("Gupta") and Srinivas Bandamede ("Bandamede") (collectively, "Plaintiffs") in the above-referenced matter. We write on behalf of all parties to respectfully request judicial approval of the parties' revised FLSA settlement.

As Your Honor recalls, the parties agreed to a settlement for the total amount of \$75,000.00 (each of the two individual Defendants will be paying \$37,500.00). On January 29, 2020, the Court ordered the parties to revise the settlement agreements to limit the release to wage causes of action only and to remove the confidentiality clause. The parties have revised the agreements to reflect those changes. The Settlement Agreements are attached as Exhibits A and B.

Given the risks for both sides in the litigation, the Proposed Agreements awarding Plaintiffs' a total sum of \$75,000.00 is fair and reasonable. The Settlement Agreements provides Plaintiffs with an immediate recovery, as opposed to a delayed recovery, a paper judgment or none at all. The Settlement Agreements are the result of hard-fought, arm's-length bargaining between experienced counsel. The parties' attorneys focus on litigating wage and hour cases, such as this one, and negotiated the settlement over the course of several months.

For the reasons above and those previously provided to the Court, the parties respectfully seek an Order granting their Motion and approving the Agreements as a fair and adequate resolution of a bona fide dispute between the Parties arising under federal and state law.

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Accordingly, we respectfully request that the Court approve the revised Settlement Agreements and dismiss this case with prejudice. We thank Your Honor for your time and attention to this matter.

Respectfully submitted,

Akin Law Group PLLC

/s/ Robert D. Salaman

Robert D. Salaman

cc: Dominick Bratti